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March 2, 2023

VIA ECF

Leda Dunn Wettre, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

**RE: *United States of America v. Alden Leeds, et al.*
Civil Action No. 2:22-cv-07326 (MCA-LDW)
Request for Conference**

Dear Magistrate Judge Wettre:

All parties to the above-referenced action jointly write to respectfully request a case management conference to discuss preliminary matters with the Court. This case differs from the typical civil action in that the parties reached amicable resolution of their dispute before the case was filed and seek Court approval of their settlement. Moreover, although there are dozens of named Defendants, most Defendants are members of joint-defense groups that are represented by liaison counsel. These circumstances allow the parties to streamline or dispense with certain preliminary matters pertaining to service of process and responding to the Complaint.

With respect to service of process, the parties do not believe it is necessary to burden the docket with a separate proof or waiver of service of process for each Defendant. Rather, since most Defendants are in joint-defense groups represented by liaison counsel, the parties propose that liaison counsel for each group be allowed to file a single waiver service of process for their group members who so choose. The groups are identified in Exhibit A to this letter.

Furthermore, the parties do not believe it is necessary for the Defendants to respond to the Complaint at this time. The United States and Defendants have a common goal in this matter: entry of the agreed-upon Consent Decree. The

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Complaint was filed as a necessary formality to commencing the action. But answering the Complaint would serve only to insert disputes where none are necessary. Moreover, answering the Complaint would trigger deadlines for crossclaims, counterclaims, and third-party practice, which would only add unnecessary complication to this case. If during the course of the proceedings answering the Complaint and/or filing corporate disclosure statements becomes necessary, the Court can impose a deadline to do so. The parties therefore request that the Court stay all deadlines to respond to the Complaint and file corporate disclosure statements pending further order from the Court.

The parties respectfully request the Court's approval of their above-described proposed handling of preliminary matters. They would appreciate the opportunity to discuss the proposals with the Court, including any feedback or proposed modifications the Court may have. Alternatively, the parties have prepared the attached proposed order, attached as Exhibit 1, which the Court can enter in lieu of a conference if it sees fit.

Thank you for your attention to this matter.

Very truly yours,

s/ Laura J. Rowley

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Enclosures

cc: All counsel of record